

**R. Hance Haney**  
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700  
Washington, DC 20036

202 429 3125  
202 293 0561 fax  
Email hhane@qwest.com



November 22, 2002

**EX PARTE**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest  
Communications International Inc. for Authorization to Provide  
In-Region, InterLATA Service in the States of Colorado, Idaho,  
Iowa, Montana, Nebraska, North Dakota, Utah, Washington  
and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to respond to Eschelon’s allegations regarding dial tone loss.

In its comments, Eschelon describes a “composite hypothetical” scenario of dial tone loss. Because it is a composite, Qwest cannot provide an exact cause for the predicament Eschelon describes. Qwest can, however, confirm that the vast majority of conversions do not cause an extended out of service condition as described in Eschelon’s hypothetical. CLECs do not need to take any additional steps to prevent customers from losing dial tone. In the event a customer loses dial tone, Eschelon and other CLECs should continue to contact Qwest’s service center so that Qwest’s agents can determine the cause of the outage and have service restored as promptly as possible.

Eschelon’s allegation that Qwest does not complete its conversion work until the CLEC contacts Qwest is inaccurate. When a CLEC uses the frame due time (“FDT”) field on UNE-P conversion LSRs, the FDT amounts only to a request. Qwest uses the requested FDT on its internal service order(s) to queue the work request so that it will not be done prior to the FDT. The work therefore occurs at or after the time specified, based on workload. Eschelon’s allegation that the work actually is complete only when it contacts Qwest about an outage defies logic. When a customer is experiencing an “outage” (such as the one described by Eschelon in its hypothetical), it is because the conversion activity has not been fully completed.<sup>1</sup>

---

<sup>1</sup> See Williams Reply Declaration at ¶ 33.

In response to Eschelon's allegations regarding extended conversion outages, Qwest determined that the incidence rate for such outages was 0.08%. This figure was based on an ad hoc analysis of call center tickets associated with conversion orders where Qwest found that, of 31,919 conversion LSRs processed in August and September, only 26 experienced disruptions that lead to a call to the ISC to report a problem with the conversion.<sup>2</sup> Nevertheless, as a result of its ongoing performance improvement efforts, Qwest has identified a minor system issue that, when corrected, will reduce the incidence of service outages associated with UNE-P conversions. The fix will go into effect on December 29, 2002.

The twenty-page limit does not apply to this filing.

Respectfully submitted,

*Hance Hance*

cc: E. Yockus  
M. Carowitz  
G. Remondino  
J. Myles  
R. Harsch  
J. Jewell  
P. Baker  
C. Post  
P. Fahn  
B. Smith  
J. Stanley  
C. Washburn  
S. Vick  
S. Oxley  
J. Orchard

---

<sup>2</sup> See *id.* at ¶ 35